

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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| IN RE: ABC DENTISTRY, P.A., ET AL. Debtor, | § § § § § | CASE NO. 16-34221 (CHAPTER 11) JUDGE MARVIN ISGUR |
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| SAEED ROHI Plaintiff v. BREWER & PRITCHARD, A PROFESSIONAL CORPORATION, J. MARK BREWER, A. BLAIRE HICKMAN, CHARLES LONG AND CAGE, HILL & NIEHAUS, LLP | § § § § § § § § § § § | ADVERSARY PROC. NO. 18-03205 |
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**AGREED STIPULATION REGARDING THE DESIGNATION
OF EXPERT WITNESSES AND DISCOVERY DEADLINE**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE MARVIN ISGUR:

Pursuant to the Federal Rule of Bankruptcy Procedure 7037 and Federal Rule of Civil Procedure 29, Plaintiff Dr. Saeed Rohi, with the consent and agreement of the Defendants, files this Agreed Stipulation Regarding the Designation of Expert Witnesses and Discovery Deadline.

The Joint Discovery / Case Management Plan (“Plan”) calls for Plaintiff to designate experts and provide reports by June 21, 2021, and Defendants to do so by July 22, 2021. ECF No. 88. The Plan also states that the planned discovery and depositions can reasonably be completed by August 31, 2021. *Id.*

The Parties have worked diligently to conduct discovery. The Parties have largely completed written discovery. Defendants took the deposition of Dr. Saeed Rohi on June 2, 2021

and Pilar Carrera on June 3, 2021. Plaintiff took the deposition of J. Mark Brewer on June 8, 2021. The deposition of A. Blaire Hickman is set for Thursday, July 1, 2021. However, as Party depositions are ongoing, deadlines for the designation of expert witnesses are not currently feasible. As a result, the discovery necessary for the case will not likely be completed prior to August 31, 2021. The Parties need additional time to designate experts, take expert depositions, and complete discovery. Accordingly, the Parties have agreed to the following:

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| Plaintiff's Designation of Experts: | August 24, 2021 |
| Defendants' Designation of Experts: | September 23, 2021 |
| Completion of Discovery: | October 25, 2021 |

The Parties request the Court to enter the attached order which amends the Plan and reflects the above discovery deadlines.

Dated: July 13, 2021.

Respectfully submitted,

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CERTIFICATE OF SERVICE

On this day I filed this document with the CM/ECF system, which will send a notice of electronic filing to all parties requesting and entitled to receive ECF notice.

Dated: July 13, 2021.

/ s / David Eric Kassab

David Eric Kassab